

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

TERI DEAN,)	
)	
Plaintiff,)	Cause No. 5:19-cv-06022-BP
)	
v.)	
)	
EDWARD BEARDEN, et al.)	
)	
Defendants.)	

PLAINTIFF'S EXPERT DISCLOSURES

Comes now Plaintiff, by and through her Counsel, and discloses the following experts pursuant to Federal Rule of Civil Procedure 26:

I. Rule 26(a)(2)(A) Expert Disclosures

- a. Any and all health care providers, including but not limited to counselors, therapists, psychiatrists and psychologists, who Plaintiff Teri Dean was seen, evaluated and/or treated by while incarcerated at Chillicothe Correctional Center between June 2012 and October 2018. These individuals are identified within the records produced by the Missouri Department of Corrections on January 15, 2020, including, but not limited to, MODOC 011306-014296.
- b. Any and all health care providers, including but not limited to counselors, therapists, psychiatrists and psychologists, who Plaintiff Teri Dean was seen, evaluated and/or treated by while incarcerated at Women's Eastern Reception, Diagnostic and Correctional Center between October 2018 and present. These individuals are identified within the records produced by the Missouri Department of Corrections on January 15, 2020, including, but not limited to, MODOC 011306-014296.

II. Rule 26(a)(2)(B) Expert Disclosures

- a. Dr. Dora Schriro, Ed.D, J.D., New York, New York. Dr. Schriro is a former director of the Missouri Department of Corrections who will provide opinions about the actions or lack of action by DOC officials and contract employees of DOC.
- i. The curricula vitae of Dr. Schriro is attached hereto. By agreement of the parties, these disclosures will be supplemented with Dr. Schriro's report on or by January 17, 2020.
- b. Dr. Melissa Piasecki, M.D., Reno, Nevada. Dr. Piasecki is a forensic psychiatrist who has evaluated Plaintiff regarding effects of sexual assault by Edward Bearden, Elijah L. Mosier, Todd E. Mustain, and Kevin K. Reed.
- i. The report and curricula vitae of Dr. Piasecki are attached hereto.

Respectfully submitted,

/s/ Jenifer C. Snow

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served upon all Counsel via email this 3rd day of February, 2020.

/s/ Jenifer C. Snow
